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## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Applicants:	Tinku Acharya, Niloy J. Mitra and Prahir K. Biswas	§	Art Unit:	2623
Serial No.:	09/390,255	§		
Filed:	September 3, 1999	§	Examiner:	Timothy M. Johnson
Title:	Wavelet Zerotree Coding of Ordered Bits	§	Docket No.	ITL.0210US (P7057)

Box A1  
Commissioner for Patents  
Washington, DC 20231

REPLY TO OFFICE ACTION DATED JULY 26, 2002

Dear Sir:

In an Office Action mailed on July 26, 2002, the Examiner maintained the § 102(c) rejections of claims 1-15 in view of Zandi. In response to the last Reply by Applicant, the Examiner states "when zerotree coding, the very purpose is 'to indicate zerotree roots' that are associated with the wavelet coefficient ordered bits, as claimed, in order to encode the tree at a very low cost." Final Office Action, p. 4. The Examiner further adds, "to indicate zerotree roots, each of the ordered bits of the wavelet coefficients are tested for significance." *Id.*

However, contrary to the Examiner's contentions, Zandi does not teach the claim limitations. In this manner, Zandi is directed to zerotree encoding of *coefficients*, not coding bits to indicate zerotree roots that are associated with *bit orders*. Therefore, regardless of whether the Examiner's assertion that to indicate zerotree roots each of order bits of wavelet coefficients are tested for significance is true or not, testing ordered bits to determine whether a particular wavelet coefficient is or is not a zerotree root does not teach or even suggest locating zerotrees for bit orders of wavelet coefficients. Furthermore, neither Zandi nor any other reference cited by the Examiner supports the Examiner's contention that the very purpose of zerotree coding is to indicate zerotree roots that are associated with wavelet coefficient ordered bits.

Thus, Zandi fails to teach or suggest coding bits of each order to indicate zerotree roots that are associated with the order, as set forth in independent claim 1; fails to teach or suggest

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Debra Cuhrona

instructions to cause a processor to code bits of each order to indicate zero tree roots that are associated with the order, as set forth in independent claim 7; and fails to teach or suggest a memory that stores a program to cause a processor to code bits of each order to indicate zero tree roots that are associated with the order, as set forth independent claim 12.

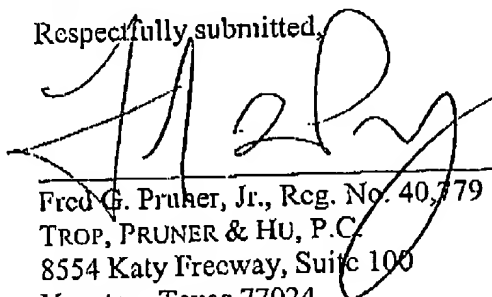
Therefore, because Zandi fails to teach all of the limitations of any independent claim, withdrawal of the § 102(e) rejections of claims 1-15 in view of Zandi is requested.

### CONCLUSION

In view of the foregoing, withdrawal of the § 102(e) rejections and a favorable action in the form of a Notice of Allowance are requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (ITL.0210US).

Respectfully submitted,

Date: September 26, 2002

  
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